

E-filed April 9, 2008

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ATTORNEYS FOR USA CAPITAL DIVERSIFIED TRUST DEED FUND, LLC

**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:  
 USA CAPITAL REALTY ADVISORS, LLC,  
 Debtor.

In re:  
 USA CAPITAL DIVERSIFIED TRUST DEED  
 FUND, LLC,  
 Debtor.

In re:  
 USA CAPITAL FIRST TRUST DEED FUND, LLC,  
 Debtor.

In re:  
 USA SECURITIES, LLC,  
 Debtor.

**Affects:**

- ☐ All Debtors
- ☐ USA Commercial Mortgage Company
- ☐ USA Securities, LLC
- ☐ USA Capital Realty Advisors, LLC
- ☒ USA Capital Diversified Trust Deed Fund, LLC
- ☐ USA First Trust Deed Fund, LLC

Case No. BK-S-06-10725 LBR  
 Case No. BK-S-06-10726 LBR  
 Case No. BK-S-06-10727 LBR  
 Case No. BK-S-06-10728 LBR  
 Case No. BK-S-06-10729 LBR

Chapter 11

Jointly Administered Under  
 Case No. BK-S-06-10725-LBR

**NOTICE OF TAKING 2004  
 EXAMINATION OF (1) AD  
 ALBUQUERQUE  
 DEVELOPMENT, LLC; (2)  
 INTERSTATE COMMERCE  
 CENTER, LLC; (3) ROBERT A.  
 RUSSELL; (4) RUSSELL A D  
 DEVELOPMENT GROUP, LLC;  
 AND (5) UNSER/CENTRAL  
 PARTNERS, LLP**

**Date: May 6, 2008**

**Time: 10:00 a.m.**

**Location: FTI Consulting, One  
 Renaissance Square, Two North  
 Central Avenue, Suite 1200,  
 Phoenix, AZ 85004-2322**

**Snell & Wilmer**

LLP  
 LAW OFFICES  
 3883 HOWARD HUGHES PARKWAY, SUITE 1100  
 LAS VEGAS, NEVADA 89169  
 (702) 784-5200

1 TO: (1) AD ALBUQUERQUE DEVELOPMENT, LLC; (2) INTERSTATE COMMERCE  
2 CENTER, LLC; (3) ROBERT A. RUSSELL; (4) RUSSELL A D DEVELOPMENT  
3 GROUP, LLC; and (5) UNSER/CENTRAL PARTNERS, LLP, and ALL OTHER  
INTERESTED PARTIES:

4 PLEASE TAKE NOTICE that on or before **April 11, 2008** the following entities and/or  
5 individuals will produce documents to USA Capital Diversified Trust Deed Fund, LLC ("DTDF")  
6 pursuant to the respective subpoenas served upon them:

- 7 • AD Albuquerque Development, LLC, *see* Exhibit A;
- 8 • Interstate Commerce Center, LLC, *see* Exhibit B;
- 9 • Robert A. Russell, *see* Exhibit C;
- 10 • Russell A D Development Group, LLC, *see* Exhibit D, and
- 11 • Unser/Central Partners, LLP, *see* Exhibit E.

12 Notice is further given that the above-referenced entities and/or individuals have agreed to  
13 and will submit to examination pursuant to Federal Rule of Bankruptcy Procedure 2004 at the  
14 business offices of FTI Consulting, One Renaissance Square, Two North Central Avenue, Suite  
15 1200, Phoenix, Arizona 85004-2322, upon oral examination, before a Notary Public or before  
16 some other officer authorized by law to administer oaths, at **10:00 a.m. on May 6, 2008**.

17 Notice is further given that the 2004 examinations may be recorded by any appropriate  
18 means, which shall include, without limitation, audio and video recording. In the event the  
19 examinations are recorded by means other than written transcription, at the time of introduction  
20 and/or filing of such recording, written transcriptions of the examinations shall be presented to the  
21 Court.

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8686369.1

1 These 2004 examinations will continue from day to day until completed.

2 Dated this 9<sup>th</sup> day of April, 2008.

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4 SNELL & WILMER LLP

5  
6 By: 

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17 *Attorneys for USA Capital Diversified Trust Deed Fund,*  
18 *LLC*

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